

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:22-CV-00500-D-BM

IAN McLAUGHLIN,

Plaintiff,

v.

LILY CHIN,

Defendant.

DEFENDANT LILY CHIN'S NOTICE
OF FILING PROPOSED SEALED
DOCUMENTS

Pursuant to Local Civil Rule 79.2 and CM/ECF Policy Manual § V.G.1(e), Defendant Lily Chin hereby gives notice that she has provisionally filed under seal the following exhibits to her response in opposition to motion to seal:

1. ECF No. 40, *Doe v. Doe*, No. 23-1058 (4th Cir. May 16, 2023) (Exhibit 1) (DE 46-1)
2. PACER Case Locator Search Result (Exhibit 5) (DE 46-2)

Although these documents are publicly available and Ms. Chin does not contend that these documents should be sealed, she understands that Mr. McLaughlin may contend that public disclosure of the documents in the context of this case would link him to another case filed under a pseudonym. Ms. Chin has therefore filed the documents provisionally under seal in an abundance of caution to allow Mr. McLaughlin the opportunity to request that the documents remain sealed.

Pursuant to CM/ECF Policy Manual § V.G.1(e), if Mr. McLaughlin desires that the documents remain sealed, he must file a motion to seal, supporting memorandum, and proposed order within seven days after service of this notice.

This the 22nd day of January, 2024.

ELLIS & WINTERS LLP

/s/ Kelly Margolis Dagger

Kelly Margolis Dagger

N.C. State Bar No. 44329

kelly.dagger@elliswinters.com

James M. Weiss

N.C. State Bar No. 42386

jamie.weiss@elliswinters.com

Chelsea Pieroni

N.C. State Bar No. 59816

chelsea.pieroni@elliswinters.com

P.O. Box 33550

Raleigh, NC 27636

Telephone: (919) 865-7000

Facsimile: (919) 865-7010

Counsel for Defendant Lily Chin